

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

IN RE:	§	Case No. 17-30910-HCM-7
TIM-CO ENGINE SERVICES &	§	
EQUIPMENT, INC.	§	
Debtor	§	

MOTION TO SELL REAL PROPERTY

This pleading requests relief that may be adverse to your interests.

If no timely response is filed within 21 days from the date of service, the relief requested herein may be granted without a hearing being held.

A timely response is necessary for a hearing to be held.

Ronald E. Ingalls, Trustee, files this Motion to Sell Real Property pursuant to § 363(b), and would show the Court as follows:

1. This case was filed on June 7, 2017. The movant has been appointed as the Chapter 7 trustee in this case.
2. Among the assets of the estate is the real property known as 6348 Mayfair, Houston, Harris County, Texas 77087, together with all improvements and accessories (the “Property”). The Property is described as Lots 31, 32, 33 & 34, Lot 5, Mayfair—HB Prentiss, Harris County, Texas.
3. The Trustee has marketed the property for sale through the assistance of his broker, ResideTX Properties.
4. The Trustee had received an offer to purchase the Property by Jerry Brice. The Trustee is not aware of any connections between Brice and any other party in this case. The gross sales price on the contract is \$200,000.00. A copy of the contract is attached as an exhibit to this motion.

5. The information available to the Trustee indicates that the estate will be able to pay the income tax due, if any, on the sale of the Property.

6. BBVA Compass Bank has a first deed of trust lien. The scheduled amount of the claim is \$35,00.00. This lien should be paid at closing.

7. The Trustee has been represented by ResideTX Properties, as his real estate broker in connection with the sale of the Property. The application to employ ResideTX Properties proposes a 6% real estate broker commission. The contract for sale provides for the ordinary and customary split of the real estate broker commission between the seller's broker and the buyer's broker. The Trustee requests authority to pay the broker commission at closing.

8. The Trustee requests that he be allowed to pay ordinary necessary cost of closing, including the ad valorem taxes due, if any, and allow for an appropriate pro-ration for the current year ad valorem taxes. The Trustee requests authority to execute all appropriate documents to consummate this sale.

WHEREFORE PREMISES CONSIDERED, Ronald E. Ingalls, Trustee, prays that the Court approve the sale of the Property, and pay the reasonable and necessary cost of closing including broker commission, pay the expenses and costs at closing, pay the debt to BBVA Compass Bank, and for other just relief.

Respectfully submitted,

/s/ Ronald Ingalls
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CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

The signature above certifies that the foregoing document has been served by first class U.S. mail, via a noticing service, with the service ordered on August 9, 2017, on the attached matrix.